IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO
v.	:	DATE FILED:
CORINTHIAN RIVERS	:	VIOLATIONS: 18 U.S.C. § 1344 (bank fraud - 1 count) 18 U.S.C. § 1028A(a)(1),(c)(5) (aggravated identity theft - 1 count)
	INFORM	<u>MATION</u>

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

- 1. Wachovia Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 33869-9.
- 2. Defendant CORINTHIAN RIVERS was an International Customer Service Representative at Wachovia Bank who frequently worked alone during the 11 p.m. to 7 a.m. shift at the Wachovia Bank branch located at Broad and Market Streets in Philadelphia, Pennsylvania, and whose duties included the investigation of problems with wire transfers between foreign and domestic banks, as well as Trade Product Services (TPS) items.

3. From in or about May 2004, through in or about October 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

CORINTHIAN RIVERS

knowingly executed, and attempted to execute, a scheme to defraud Wachovia Bank, and to obtain monies owned by and under the care, custody, and control of Wachovia Bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

It was part of the scheme to defraud that:

- 4. Defendant CORINTHIAN RIVERS, who as a result of her employment with Wachovia Bank had access to confidential information about Wachovia Bank customers, including, but not limited to, access to dates of birth and social security numbers, agreed to provide an individual she had previously known with confidential Wachovia Bank customer information. Specifically, defendant RIVERS agreed to provide this individual with the social security number and date of birth for various Wachovia Bank customers whose accounts the individual requested.
- 5. Defendant CORINTHIAN RIVERS, who knew that the individual had unlawfully obtained the names and account numbers of certain Wachovia Bank customers from various store employees who made photocopies of checks which the customers used to pay for their merchandise, provided the individual with confidential information for more than 50 Wachovia Bank customers.

- 6. Defendant CORINTHIAN RIVERS received cash from the individual in exchange for the confidential Wachovia Bank customer information which the defendant provided to him.
- 7. Defendant CORINTHIAN RIVERS compromised the Wachovia Bank customer accounts, caused unauthorized withdrawals of funds to be made, and directly caused a fraudulent loss to Wachovia Bank in the amount of approximately \$449,070.

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

 The allegations contained in paragraphs one and two and four through seven of Count One of

this information are incorporated here.

2. From in or about May 2004, through in or about October 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

CORINTHIAN RIVERS

knowingly and without lawful authority transferred and used a means of identification of another person, that is, the social security numbers and dates of birth for more than 50 Wachovia Bank customers, during and in relation to a bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

PATRICK L. MEEHAN United States Attorney

4